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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:	:	Chapter 11
	:	
JAZZ PHOTO CORP.,	:	Case No. 03-26565 (MS)
	:	
	:	Hearing Date: July 28, 2003
Debtor.	:	
	:	Oral Argument Requested

**NOTICE OF MOTION FOR AN ORDER DETERMINING THAT
JCB CONSULTANTS, INC. IS A PROFESSIONAL PERSON, THAT JCB
CONSULTANTS, INC. IS NOT DISINTERESTED AND FOR DISGORGEMENT**

TO: ALL PARTIES ON THE ANNEXED SERVICE LIST

COUNSEL:

PLEASE TAKE NOTICE that on July 28, 2003, at 10:00 a.m., or soon thereafter
as counsel may be heard, Lowenstein Sandler PC and Stroock & Stroock & Lavan, LLP, co-

counsel to Fuji Photo Film Co., Ltd. ("Fuji"), shall move before the Honorable Morris Stern at the United States Bankruptcy Court, King Federal Building, 50 Walnut Street, 3rd Floor, Newark, New Jersey 07102, seeking the entry of an Order determining that JCB Consultants, Inc. ("JCB") is a professional person within meaning of 11 U.S.C. §327, that JCB is not disinterested and for disgorgement

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the Application submitted herewith. No brief is necessary as the factual and legal basis for the relief requested is adequately set forth in the Application. A proposed form of Order is submitted herewith. Oral argument is hereby requested.

PLEASE TAKE FURTHER NOTICE that any objection to the Motion must be filed with the Court in writing and with a copy served on counsel for Fuji no less than seven (7) days prior to the hearing date. In the event that no objections are timely filed, the relief requested in this Motion may be granted.

Respectfully yours,

LOWENSTEIN SANDLER PC
Co-counsel to Fuji Photo Film Co., Ltd.

By: /s/ Bruce Buechler
Bruce Buechler

Dated: July 3, 2003